

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
(Newport News Division)**

JAMES T. PARKER, II, <u>et al.</u>)	
)	
Plaintiffs,)	
)	
v.)	Case No: 4:18-cv-00140-HCM-DEM
)	
FREEDOM MORTGAGE)	
CORPORATION, <u>et al.</u> ,)	
)	
Defendants.)	
_____)	

**DEFENDANT FREEDOM MORTGAGE’S CONFIDENTIAL MEMORANDUM IN
SUPPORT OF ITS MOTION TO SEAL**

In support for its Motion to Seal, Defendant, Freedom Mortgage Corporation (“Freedom Mortgage”), states as follows:

1. Freedom Mortgage moves the Court for leave to file under seal portions of its Consolidated Reply in Support of its Motion to Seal Motion for Protective Order and the underlying Motion for Protective Order Regarding Confidentiality Designations (“Consolidated Reply”) with supporting documents being filed contemporaneously herewith and in accordance with the Protective Order entered by the Court on June 28, 2019. (Docket No. 20).

2. Freedom Mortgage files this Consolidated Reply in Support of its Motion to Seal The Motion for Protective Order and the underlying Motion for Protective Order Regarding Confidentiality Designations. In this regard, as the instant Reply supports the same Motion, Freedom Mortgage hereby incorporates by reference its arguments in the Confidential Memorandum in Support of its Motion to Seal the underlying Motion. See Docket No. 28.

Having met the requirements under for sealing court documents, Freedom Mortgage respectfully requests that the Court grant its Motion to Seal.

Respectfully submitted,

/s/ Walter Buzzetta

Walter J. Buzzetta, Esq. (68006)
STRADLEY RONON STEVENS & YOUNG, LLP
2000 K Street, NW, Suite 700
Washington, D.C. 20006
(202) 507-6407 (direct) / (202) 822-0140 (fax)
wbuzzetta@stradley.com

and

Andrew K. Stutzman, Esq. (*admitted pro hac vice*)
STRADLEY RONON STEVENS & YOUNG, LLP
2005 Market Street, Suite 1600
Philadelphia, PA 19103
215-564-8008 (direct) / 215-564-8120 (fax)
astutzman@stradley.com

*Attorneys for Defendant
Freedom Mortgage Corporation*

Date: September 23, 2019

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2019, I caused the foregoing motion to be electronically filed with the Clerk of the Court, which caused it to be served on all counsel of record.

/s/ Walter Buzzetta
Walter J. Buzzetta